

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
LAKE CHARLES DIVISION

NICOLE EDWARDS

CIVIL ACTION NO. 2:19-cv-01150

*Versus*

JUDGE JAMES D. CAIN, JR.

CITY OF LAKE CHARLES, ET AL

MAGISTRATE JUDGE: KATHLENE  
KAY

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**DAUBERT MOTION IN LIMINE TO EXCLUDE THE TESTIMONY OF TERRY  
ANDERSON**

NOW INTO COURT, through undersigned counsel, Plaintiff, Nicole Edwards, moves this Honorable Court to exclude the “expert” testimony and report of Defendants’ witness, Terry Anderson, whose report offers legal conclusions as opinions, unduly credits the Defendants’ factual assertions, offers opinion testimony that appears to be both irrelevant and unsupported by data or proper methodology, and is litigation driven.

WHEREFORE, Plaintiff respectfully requests this Court grant this *Daubert* Motion in Limine to Exclude the Testimony of Terry Anderson.

Respectfully Submitted,

/s/Glenn C. McGovern

Glenn C. McGovern (LBA #9321)

Callan J. Johns (LBA #38788)

Peyton M. Bowman (LBA #38679)

Mailing Address:

P.O. Box 516

Metairie, LA 70004-0516

Physical Address:

2901 Division Street, Suite 201

Metairie, LA 70002

Telephone: 504.456.3610

Facsimile: 504.456.3611

E-mail: glenn@glennmcgovern.com  
*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I do hereby certify that a copy of the foregoing pleading has been electronically filed with the Clerk of Court using the ECF system which sent notification to all counsel of record who are ECF users on this 16th day of September, 2021.

/s/Glenn C. McGovern

Glenn C. McGovern